

October 17, 2002

RE: C & D Technologies, Inc 045-15910-00008  
TO: Interested Parties / Applicant  
  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

October 17, 2002

Mr. C. Dale Brown  
C & D Technologies, Inc.  
P. O. Box 279  
Attica, IN 47918-0279

Re: 045-15910  
Third Administrative Amendment to  
FESOP 045-11285-00008

Dear Mr. Brown:

C & D Technologies, Inc. was issued a permit on May 26, 2000 for the operation of a custom industrial battery manufacturing source. A letter requesting a change was received on July 19, 2002. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

C & D Technologies, Inc. has requested that Group 5, units EU300A, EU300B and EU300Bn venting through stacks 232, 85 and 233 respectively, contained in Section D.2 of the FESOP 045-11285-00008, and all related permit conditions for Group 5 be removed from their FESOP. Stacks 232, 85 and 233 previously were vented to the atmosphere. All emissions from the stacks are collected internally by bin vent dust collectors. Group 5 visible emissions (D.2.9) and record keeping (D.2.16) permit conditions are still in effect for all observed external exhaust. Due to the emission from Group 5 being lead oxide all other Group 5 conditions may have minor changes but are still effective. The permit language is amended as follows with all deleted changes indicated with strikeout and new additions indicated with italic bold type.

Condition A.2 is amended as follows:

The Pasting operation has the following changes:

***Stacks 232, 85 and 233 no longer exhaust to the atmosphere.***

A.2 Emissions Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

**Facility Description [326 IAC 2-8-4(10)]:**

**Pasting**

- (f) One (1) positive lead oxide bulk handling operation, known as EU 0300A, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting ***internally*** through ~~Stack 84 to be replaced by Stack~~ ***bin vent*** 232, capacity: 1,526 pounds of positive lead oxide per hour, limited by the formation bottleneck to 689,752 pounds (61.9% of capacity) per month.
- (g) One (1) positive oxide storage, known as EU 0300A, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting ***internally*** through ~~Stack~~ ***bin vent*** 232, capacity: 2,088 pounds of positive lead oxide per hour, limited by the formation bottleneck to 1,191,581 pounds (78.2% of capacity) per month.

- (h) One (1) negative lead oxide bulk handling operation, known as EU 0300B, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting ***internally*** through ~~Stack~~ ***bin vent*** 85, capacity: 1,526 pounds of negative lead oxide per hour, limited by the formation bottleneck to 665,336 pounds (59.7% of capacity) per month.
- (i) One (1) negative oxide storage, known as EU 0300Bn, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting ***internally*** through ~~Stack~~ ***bin vent*** 233, capacity: 2,016 pounds of positive lead oxide per hour, limited by the formation bottleneck to 973,728 pounds (66.2% of capacity) per month.

Section D.2 is amended as follows:

The Pasting operation has the following changes:

***Stacks 232, 85 and 233 no longer exhaust to the atmosphere.***

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Grid Casting

- (e) Four (4) natural gas-fired grid curing ovens, known as EU 0200B through EU 0200E, to be installed, exhausting through Stacks 226 - 229, respectively, rated at 0.140 million British thermal units per hour each, total process capacity: 3,634 pounds of casted lead grid plates per hour, limited by the formation bottleneck to 1,886,884 pounds (71.1% of capacity) per month.

#### Pasting

- (f) One (1) positive lead oxide bulk handling operation, known as EU 0300A, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting **internally** through ~~Stack 84 to be replaced by Stack~~ **bin vent** 232, capacity: 1,526 pounds of positive lead oxide per hour, limited by the formation bottleneck to 689,752 pounds (61.9% of capacity) per month.
- (g) One (1) positive oxide storage, known as EU 0300A, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting **internally** through ~~Stack~~ **bin vent** 232, capacity: 2,088 pounds of positive lead oxide per hour, limited by the formation bottleneck to 1,191,581 pounds (78.2% of capacity) per month.
- (h) One (1) negative lead oxide bulk handling operation, known as EU 0300B, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting **internally** through ~~Stack~~ **bin vent** 85, capacity: 1,526 pounds of negative lead oxide per hour, limited by the formation bottleneck to 665,336 pounds (59.7% of capacity) per month.
- (i) One (1) negative oxide storage, known as EU 0300Bn, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting **internally** through ~~Stack~~ **bin vent** 233, capacity: 2,016 pounds of positive lead oxide per hour, limited by the formation bottleneck to 973,728 pounds (66.2% of capacity) per month.
- (j) Removed from Service.
- (k) One (1) paste mixing system, known as EU 0300C, equipped with a Tri Mer wet scrubber, to be installed, exhausting through Stack 231, capacity: 6,268 pounds of negative and positive lead oxide, expander, and dilute sulfuric acid per hour, limited by the formation bottleneck to 2,150,545 pounds (47.0% of capacity) per month.
- (l) One (1) expander manufacturing operation, known as EU 0300D, installed in 1983, equipped with Farr Model 24 LS dust collector, exhausting through Stack 159, capacity: 312 pounds of lead oxide, carbon black, barytes, and barium sulfate per hour.
- (m) One (1) grid pasting system, known as EU 0300E, equipped with a Sly Manufacturing scrubber, to be installed, exhausting through Stack 230, capacity: 11,663 pounds of positive and negative lead paste and lead grids per hour, limited by the formation bottleneck to 4,037,854 pounds (47.4%) per month.
- (n) Four (4) humidity ovens, known as EU 0300 F, G, H and I, exhausting through Stacks 26, 27, 28 and 29, respectively, total process capacity: 2,012 pounds of lead plates per hour, limited by the formation bottleneck to 1,255,488 pounds (85.5% of capacity) per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-8-5(1)]

### D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the facilities listed in this section shall not exceed the stated PM emission rates listed in the following table:

Operation	Process Weight Rate (tons per hour)	Allowable PM Emission Rate (pounds per hour)
Natural gas-fired grid curing ovens (EU 0200B through EU 0200E) Stacks 226 - 229	3,634 total	6.12 total
Positive lead oxide bulk handling (EU 0300A) Stack 84	1,526	3.42
Positive oxide storage (EU 0300A) <del>Stack</del> <b>Bin Vent</b> 232	2,088	4.22
Negative lead oxide bulk handling (EU 0300B) <del>Stack</del> <b>Bin Vent</b> 85 (0300B)	1,526	3.42
Negative oxide storage (EU 0300Bn) <del>Stack</del> <b>Bin Vent</b> 233	2,016	4.12
Paste mixing system (EU 0300C) Stack 231	6,268	8.81
Expander manufacturing (EU 0300D) Stack 159	312	1.18
Grid pasting (EU 0300 E) Stack 230	11,663	13.4
Humidity ovens (EU 0300 F, G, H, and I) Stacks 26 - 29	2,012 total	4.12
Natural gas-fired Universal curing ovens (EU 0300 J, K, L and M) Stacks 179, 180, 193 and 194	2,012 total	4.12
Natural gas-fired OSI Universal ovens (EU 0500E through EU 0500H) Stacks 234, 235, 237 and 238	2,456 total	4.71
3PO-plate processing (0700B) Stack 152	2,914	5.28
3PO-plate processing (0700C) Stack 151	2,914	5.28
3PO-plate processing (0700E) Stack 127	160	0.755
3PO-plate processing (0700F) Stack 247	8,473	10.8

<b>Operation</b>	<b>Process Weight Rate (tons per hour)</b>	<b>Allowable PM Emission Rate (pounds per hour)</b>
3PO-L plate assembly (0800A) Stack 140	1,444	3.30
3PO-L plate assembly (0800B) Stack 166	2,165	4.32
3PO-L plate assembly (0800C) Stack 142	2,165	4.32
3PO-MP assembly (0800D) Stack 127	2,404	4.64
3PO-JC/D assembly (0800E) Stack 247	174	0.798
3PO-MCT assembly (0800F) Stack 188	3,813	6.32
3PO-L cell cover insert (0800H) Stack 141	600	1.83
LCT 1700 assembly with two jigs (EU 0800K) Stack 244	1,302	3.08
Tank dry formation (0900A) Stack 178	200	0.877
Tank wet formation (0900B) Fugitive	3,420	5.87
Tank wet formation (0900C) Fugitive	2,215	4.39

- (b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.4 PM [326 IAC 2-2]

To avoid the requirements of 326 IAC 2-2, the hourly PM emissions from the individual emissions units shall not exceed the following:

<b>Operation/Stack ID</b>	<b>Hourly PM Emission Limits (pounds per hour)</b>
Natural gas-fired grid curing ovens (EU 0200B through EU 0200E) Stacks 226 - 229	0.0869 0.0869 0.0869 0.0869
Positive oxide storage (EU 0300A) <b>Stack <i>Bin Vent</i> 232</b>	0.1000
Negative lead oxide bulk handling (EU 0300B) <b>Stack <i>Bin Vent</i> 85 (0300B)</b>	0.0090
Negative oxide storage (EU 0300Bn) <b>Stack <i>Bin Vent</i> 233</b>	0.1201
Paste mixing system (EU 0300C) Stack 231	0.3474
Expander manufacturing (EU 0300D) Stack 159	0.0014
Grid pasting (EU 0300 E) Stack 230	0.3444
Humidity ovens (EU 0300 F, G, H, and I) Stacks 26 - 29	0.0310 0.0310 0.0310 0.0310
Natural gas-fired Universal curing ovens (EU 0300 J, K, L and M) Stacks 179, 180, 193 and 194	0.0310 0.0310 0.0310 0.0310
Natural gas-fired OSI Universal ovens (EU 0500E through EU 0500H) Stacks 234, 235, 237 and 238	0.0378 0.0378 0.0378 0.0378
3PO-plate processing (0700B) Stack 152	0.0565
3PO-plate processing (0700C) Stack 151	0.0565
3PO-plate processing (0700E) Stack 127	0.0092
3PO-plate processing (0700F) Stack 247	0.3303
3PO-L plate assembly (0800A) Stack 140	0.2662
3PO-L plate assembly (0800B) Stack 166	0.3993

Operation/Stack ID	Hourly PM Emission Limits (pounds per hour)
3PO-L plate assembly (0800C) Stack 142	0.0399
3PO-MP assembly (0800D) Stack 127	0.4433
3PO-JC/D assembly (0800E) Stack 247	0.0321
3PO-MCT assembly (0800F) Stack 188	0.7032
3PO-L cell cover insert (0800H) Stack 141	1.19
LCT 1700 assembly with two jigs (EU 0800K) Stack 244	0.072
Tank dry formation (0900A) Stack 178	0.880
Tank wet formation (0900B) Fugitive	30.1
Tank wet formation (0900C) Fugitive	19.5
Total	55.73

D.2.5 PM<sub>10</sub> [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the hourly PM<sub>10</sub> emissions from the individual emission units shall not exceed the following:

Operation/Stack ID	Hourly PM <sub>10</sub> Emission Limits (pounds per hour)
Natural gas-fired grid curing ovens (EU 0200B through EU 0200E) Stacks 226 - 229	0.0331 0.0331 0.0331 0.0331
Positive oxide storage (EU 0300A) <b>Stack Bin Vent 232</b>	0.0380
Negative lead oxide bulk handling (EU 0300B) <b>Stack Bin Vent 85 (0300B)</b>	0.0034
Negative oxide storage (EU 0300Bn) <b>Stack Bin Vent 233</b>	0.0457
Paste mixing system (EU 0300C) Stack 231	0.1322



<b>Operation/Stack ID</b>	<b>Hourly PM<sub>10</sub> Emission Limits (pounds per hour)</b>
Expander manufacturing (EU 0300D) Stack 159	0.0005
Grid pasting (EU 0300 E) Stack 230	0.1311
Humidity ovens (EU 0300 F, G, H, and I) Stacks 26 - 29	0.0118 0.0118 0.0118 0.0118
Natural gas-fired Universal curing ovens (EU 0300 J, K, L and M) Stacks 179, 180, 193 and 194	0.0118 0.0118 0.0118 0.0118
Natural gas-fired OSI Universal ovens (EU 0500E through EU 0500H) Stacks 234, 235, 237 and 238	0.0144 0.0144 0.0144 0.0144
3PO-plate processing (0700B) Stack 152	0.0215
3PO-plate processing (0700C) Stack 151	0.0215
3PO-plate processing (0700E) Stack 127	0.0035
3PO-plate processing (0700F) Stack 247	0.1257
3PO-L plate assembly (0800A) Stack 140	0.1013
3PO-L plate assembly (0800B) Stack 166	0.1520
3PO-L plate assembly (0800C) Stack 142	0.0152
3PO-MP assembly (0800D) Stack 127	0.1687
3PO-JC/D assembly (0800E) Stack 247	0.0122
3PO-MCT assembly (0800F) Stack 188	0.2677
3PO-L cell cover insert (0800H) Stack 141	0.4528
LCT 1700 assembly with two jigs (EU 0800K) Stack 244	0.0274

Operation/Stack ID	Hourly PM <sub>10</sub> Emission Limits (pounds per hour)
Tank dry formation (0900A) Stack 178	0.3350
Tank wet formation (0900B) Fugitive	11.4555
Tank wet formation (0900C) Fugitive	7.4198
Total	21.215

- (b) Compliance with these PM<sub>10</sub> emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and 326 IAC 2-2 do not apply.

**Compliance Determination Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

**D.2.7 Testing Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

- (a) Within 180 days of startup of EU 0700F, the Permittee shall perform lead and opacity testing of Stack 247 utilizing methods as approved by the Commissioner to demonstrate compliance with the NSPS Subpart KK requirements of Conditions D.2.1 and D.2.2.
- (b) Within twelve (12) months after issuance of this permit, the Permittee shall perform lead and opacity testing of one (1) of the stacks in each group as specified in the following table utilizing methods as approved by the Commissioner to demonstrate compliance with the NSPS Subpart KK requirements of Conditions D.2.1 and D.2.2. USEPA has approved an alternative stack testing parameter for only the Group 5 (EU 0300A, EU 0300B, and EU 0300Bn) lead oxide storage silos. The stack sampling time for the Group 5 test is decreased to fifteen (15) minutes. The Permittee shall perform two (2) tests and the results of these two (2) tests shall be averaged. These lead and opacity performance tests shall be repeated on a different stack for groups with multiple stacks at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration of the group. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance.

EMISSION UNITS GROUPED BY LIKE PROCESSES AND COLLECTION EQUIPMENT		
Group	Emission Unit	Stack
4	EU 0200B	226
	EU 0200C	227
	EU 0200D	228
	EU 0200E	229
5	EU 0300A	<b>Bin Vent 232</b>
	EU 0300B	<b>Bin Vent 85</b>
	EU 0300Bn	<b>Bin Vent 233</b>
6	EU 0300C	231

Group	Emission Unit	Stack
7	EU 0300D	159
8	EU 0300E	230
9	EU 0300F	26
	EU 0300G	27
	EU 0300H	28
	EU 0300I	29
10	EU 0300J	179
	EU 0300K	180
	EU 0300L	193
	EU 0300M	194
	EU 0500E	234
	EU 0500F	235
	EU 0500G	237
	EU 0500H	238
11	EU 0700F	247
	EU 0800E	247
12	EU 0700B	152
	EU 0700C	151
13	EU 0800D	127
	EU 0700E	127
14	EU 2000A	113
	EU 2000F	242
	MAINT 2000C	130
	MAINT 2000D	131
	MAINT 2000B	129
15	EU 0800A	140
	EU 0800B	166
16	EU 0800C	142
17	EU 0800F	188
18	EU 0800G	167
	EU 0800K	244
19	EU 0800H	141

- (c) The Permittee is not required to test these facilities for PM and PM<sub>10</sub> by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM and PM<sub>10</sub> limits specified in Conditions D.2.3, D.2.4 and D.2.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## **Compliance Monitoring Requirements [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)]**

### **D.2.9 Visible Emissions Notations**

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- (a) Daily visible emission notations of Stack 226 - 229, 232, 85, 233, 231, 159, 230, 26 - 29, 179, 180, 193, 194, 234, 235, 237, 238, 127, 152, 151, 247, 140, 166, 142, 188, 141, 244 and 178 exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **D.2.11 Filter Monitoring**

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Daily inspections shall be performed to verify the placement, integrity and particle loading of the HEPA filters associated with EU 0300A and 0300Bn, exhausting **internally to bin vent through Stacks 232 and 233**. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

## **Record Keeping and Reporting Requirement [326 IAC 2-8-5(3)] [326 IAC 2-8-19]**

### **D.2.16 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.9, the Permittee shall maintain records of daily visible emission notations of Stacks 226 - 229, 232, 85, 233, 231, 159, 230, 26 - 29, 179, 180, 193, 194, 234, 235, 237, 238, 127, 152, 151, 247, 140, 166, 142, 188, 141, 244 and 178 exhausts.
- (b) To document compliance with Condition D.2.10, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure;
    - (B) Cleaning cycle: frequency and differential pressure, and
    - (C) Water flow rate for the scrubbers.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Conditions D.2.11, D.2.12, and D.2.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.11, D.2.12 and D.2.13 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please find the entire FESOP permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact James Farrell, at (800) 451-6027, press 0 and ask for James Farrell or extension 3-8396, or dial (317) 233-8396.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
JF

cc: File - Fountain County  
U.S. EPA, Region V  
Fountain County Health Department  
Air Compliance Section Inspector - Jim Thorpe  
Compliance Data Section - Karen Nowak  
Administrative and Development - Lisa Lawrence  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**C & D Technologies, Inc.  
200 West Main Street  
Attica, Indiana 47918**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: <b>F 045-11285-00008</b>	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 26, 2000  Expiration Date: May 26, 2005

First Significant Permit Revision No.: 045-13609-00008, issued April 9, 2001

First Reopening No.: 045-13044-00008, issued January 14, 2002

First Administrative Amendment No.: 045-14821-00008, issued March 13, 2002

Second Administrative Amendment No.: 045-15871-00008, issued May 6, 2002

Third Administrative Amendment: <b>F 045-15910-00008</b>	Pages Affected: 6,38,42,44,45,47, 51
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 17, 2002

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- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 PM [326 IAC 2-2]
- D.1.5 PM<sub>10</sub> [326 IAC 2-8-4] [326 IAC 2-2]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

- D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)]**

- D.1.8 Particulate Matter (PM)
- D.1.9 Visible Emissions Notations
- D.1.10 Parametric Monitoring
- D.1.11 Baghouse Inspections
- D.1.12 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 2-8-19]**

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- D.2.1 Lead Emissions [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]
- D.2.2 Opacity [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]
- D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.4 PM [326 IAC 2-2]
- D.2.5 PM<sub>10</sub> [326 IAC 2-8-4] [326 IAC 2-2]
- D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]



**Compliance Determination Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

D.2.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)]**

D.2.8 Particulate Matter (PM)

D.2.9 Visible Emissions Notations

D.2.10 Parametric Monitoring

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D.2.12 Baghouse Inspections

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D.3.3 Volatile Organic Compounds (VOC)

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary custom industrial battery manufacturing source

Authorized Individual:	C. Dale Brown
Source Address:	200 West Main Street, Attica, Indiana 47918
Mailing Address:	P.O. Box 279, Attica, Indiana 47918-0279
Phone Number:	765 - 762 - 2461
SIC Code:	3691
County Location:	Fountain
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

#### **Oxide Mill**

- (a) Removed from service

#### **Casting**

- (b) One (1) small parts casting operation, known as EU 0100A, installed in 1977, equipped with a Farr 48D cartridge dust collector, to be installed, exhausting through Stack 195, capacity: 1,446 pounds of lead pigs per hour, limited by the formation bottleneck to 214,851 pounds (20.3% of capacity) per month.
- (c) One (1) small parts flaming operation, known as EU 0100B, installed in 1977, last modified October 13, 1977, exhausting through Stack 4, to be exhausted through Stack 195, equipped with a Farr 48D cartridge dust collector, to be installed, capacity: 488 pounds of small parts per hour, limited by the formation bottleneck to 214,851 pounds (60.15% of capacity) per month.
- (d) One (1) grid casting operation, known as EU 0200A, installed in 1977, equipped with a Farr 60LL cartridge dust collector, to be installed, exhausting through Stack 196, capacity: 5,197 pounds of lead pigs per hour, limited by the formation bottleneck to 1,886,883 pounds (49.7% of capacity) per month.

- (e) Four (4) natural gas-fired grid curing ovens, known as EU 0200B through EU 0200E, to be installed, exhausting through Stacks 226 - 229, respectively, rated at 0.140 million British thermal units per hour each, total process capacity: 3,634 pounds of casted lead grid plates per hour, limited by the formation bottleneck to 1,886,884 pounds (71.1% of capacity) per month.

### **Pasting**

- (f) One (1) positive lead oxide bulk handling operation, known as EU 0300A, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting internally through bin vent 232, capacity: 1,526 pounds of positive lead oxide per hour, limited by the formation bottleneck to 689,752 pounds (61.9% of capacity) per month.
- (g) One (1) positive oxide storage, known as EU 0300A, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting internally through bin vent 232, capacity: 2,088 pounds of positive lead oxide per hour, limited by the formation bottleneck to 1,191,581 pounds (78.2% of capacity) per month.
- (h) One (1) negative lead oxide bulk handling operation, known as EU 0300B, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting internally through bin vent 85, capacity: 1,526 pounds of negative lead oxide per hour, limited by the formation bottleneck to 665,336 pounds (59.7% of capacity) per month.
- (i) One (1) negative oxide storage, known as EU 0300Bn, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting internally through bin vent 233, capacity: 2,016 pounds of positive lead oxide per hour, limited by the formation bottleneck to 973,728 pounds (66.2% of capacity) per month.
- (j) Removed from Service.
- (k) One (1) paste mixing system, known as EU 0300C, equipped with a Tri Mer wet scrubber, to be installed, exhausting through Stack 231, capacity: 6,268 pounds of negative and positive lead oxide, expander, and dilute sulfuric acid per hour, limited by the formation bottleneck to 2,150,545 pounds (47.0% of capacity) per month.
- (l) One (1) expander manufacturing operation, known as EU 0300D, installed in 1983, equipped with Farr Model 24 LS dust collector, exhausting through Stack 159, capacity: 312 pounds of lead oxide, carbon black, barytes, and barium sulfate per hour.
- (m) One (1) grid pasting system, known as EU 0300E, equipped with a Sly Manufacturing scrubber, to be installed, exhausting through Stack 230, capacity: 11,663 pounds of positive and negative lead paste and lead grids per hour, limited by the formation bottleneck to 4,037,854 pounds (47.4% of capacity) per month.
- (n) Four (4) humidity ovens, known as EU 0300 F, G, H and I, exhausting through Stacks 26, 27, 28 and 29, respectively, total process capacity: 2,012 pounds of lead plates per hour, limited by the formation bottleneck to 1,255,488 pounds (85.5% of capacity) per month.

- (o) Four (4) natural gas-fired Universal curing ovens, known as EU 0300 J, K, L and M, exhausting through Stacks 179, 180, 193 and 194, respectively, rated at 0.800 million British thermal units per hour each, total process capacity: 2,012 pounds of lead plates per hour, limited by the formation bottleneck to 1,255,488 pounds (85.5% of capacity) per month.
- (p) Four (4) natural gas-fired OSI universal ovens, known as EU 0500E through EU 0500H, to be installed, exhausting through Stacks 234, 235, 237 and 238, respectively, rated at 0.800 million British thermal units per hour each, total process capacity: 2,456 pounds of lead plates per hour, limited by the formation bottleneck to 1,532,544 pounds (85.5% of capacity) per month.

### **Three Process Operation**

- (q) Removed From Service.
- (r) One (1) 3PO-plate processing operation, known as EU 0700B, installed in 1993, last modified October 26, 1993, equipped with an OSI dust collector, exhausting through Stack 152, capacity: 2,914 pounds of plate frames per hour, limited by the formation bottleneck to 1,010,672 pounds (47.5% of capacity) per month.
- (s) One (1) 3PO-plate processing operation, known as EU 0700C, installed in 1993, last modified October 26, 1993, equipped with an OSI dust collector, exhausting through Stack 151, capacity: 2,914 pounds of plate frames per hour, limited by the formation bottleneck to 1,010,672 pounds (47.5% of capacity) per month.
- (t) Removed From Service.
- (u) One (1) 3PO-plate processing operation, known as EU 0700E, installed in 1995, equipped with a Torit dust collector, exhausting through Stack 127, capacity: 160 pounds of plate frames per hour, limited by the formation bottleneck to 55,573 pounds (47.5% of capacity) per month.
- (v) One (1) 3PO-plate processing operation, known as EU 0700F, equipped with a Farr dust collector, exhausting through Stack 247, capacity: 8,473 pounds of plate frames per hour, limited by the formation bottleneck to 3,809,664 pounds per month (46.5% of capacity).
- (w) One (1) 3PO-L plate assembly operation, known as EU 0800A, installed March 30, 1984, equipped with an American air filter dust collector, exhausting through Stack 140, capacity: 1,444 pounds of cured plates and small parts per hour, limited by the formation bottleneck to 548,720 pounds (52.1% of capacity) per month.
- (x) One (1) 3PO-L plate assembly operation, known as EU 0800B, installed in 1988, last modified April 8, 1988, equipped with an American air filter dust collector, exhausting through Stack 166, capacity: 2,165 pounds of positive and negative plates and small parts per hour, limited by the formation bottleneck to 822,700 pounds (52.1% of capacity) per month.

- (y) One (1) 3PO-L plate assembly operation, known as EU 0800C, installed in 1984, last modified March 30, 1984, equipped with an OSI #10 dust collector, exhausting through Stack 142, capacity: 2,165 pounds of cured plates and small parts per hour, limited by the formation bottleneck to 822,700 pounds (52.1% of capacity) per month.
- (z) One (1) 3PO-MP assembly, known as EU 0800D, installed in 1993, last modified January 1, 1993, equipped with a Torit dust collector, exhausting through Stack 127, capacity: 2,404 pounds of cured plates and small parts and cell covers per hour, limited by the formation bottleneck to 67,112 pounds (3.8% of capacity) per month and 5.662 liters of cover adhesive per month.
- (aa) One (1) 3PO-JC/D assembly, known as EU 0800E, installed in 1994, last modified December 5, 1994, equipped with a Torit dust collector, exhausting through Stack 247, capacity: 174 pounds of cured plates and small parts and cell covers per hour limited by the formation bottleneck to 56,550 pounds per month (44.5% of capacity) and 4.943 liters of cover adhesive per month.
- (bb) One (1) 3PO-MCT assembly, known as EU 0800F, installed in 1999, equipped with a Farr 48D dust collector, exhausting through Stack 188, capacity: 3,813 pounds of lead plates and small parts and cell covers per hour, limited by the formation bottleneck to 1,652,300 pounds (59.4% of capacity) per month and 139.875 liters of cover adhesive per month.
- (cc) One (1) L-cell cover adhesive station, known as EU 0800G, installed in 1982, exhausting through Stack 167, capacity: 4,000 pounds of L-cells per hour, limited by the formation bottleneck to 2,195,000 pounds of L-cells and covers per month (75.2% of capacity) and 185.5 liters of cover adhesive per month.
- (dd) One (1) 3PO-L cell cover insert, known as EU 0800H, installed in 1984, last modified March 30, 1984, equipped with two (2) Torit dust collectors, exhausting through Stack 141, capacity: 600 pounds of assembled cells per hour, limited by the formation bottleneck to 153,600 pounds (35.1% of capacity) per month.
- (ee) One (1) LCT 1700 Assembly with two jigs, known as EU 0800K, installed in December 2000, equipped with a Farr dust collector, exhausting through Stack 244, capacity: 1,302 pounds of plates and small parts and cell covers per hour, limited by the formation bottleneck to 282,100 pounds (29.7% of capacity) per month and 23.8 liters of cover adhesive per month.

#### **Formation**

- (ff) One (1) tank dry formation, known as EU 0900A, installed in 1990, last modified March 5, 1990, equipped with a scrubber, exhausting through Stack 178, capacity: 200 pounds of lead plates per hour.
- (gg) One (1) tank wet formation, known as EU 0900B, installed in 1990, capacity: 3,420 pounds of dry batteries per hour (fugitive).
- (hh) One (1) tank wet formation, known as 0900C, to be installed, capacity: 2,215 pounds of completed dry cells per hour (fugitive).

#### **Central Vac**

- (ii) One (1) central vacuum #2, known as Maint2000B, installed October 6, 1980, exhausting through Stack 129.
- (jj) One (1) 3 process central vacuum, known as Maint2000C, installed in 1980, exhausting through Stack 130.

- (kk) One (1) 3 process central vacuum , known as Maint2000D, installed in 1980, exhausting through Stack 131.
- (ll) One (1) grid casting central vacuum #5, known as Maint2000E, installed November 19, 1999, exhausting through Stack 224.
- (mm) One (1) pasting central vacuum, known as EU 2000F, to be installed, exhausting through Stack 242.
- (nn) One (1) polyurethane battery topping, known as Misc, installed in 1990, exhausting through Stack 160, capacity: 30 gallons of perchloroethylene per month.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour consisting of fifty-six (56) existing facilities rated at total of 56.10 million British thermal units per hour, including two (2) pasting boilers, exhausting through Stacks 163 and 164, rated at 0.690 and 1.050 million British thermal units per hour, respectively.

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11). A total of thirteen (13) proposed natural gas-fired combustion facilities rated at total of 7.18 million British thermal units per hour are comprised of the eight (8) natural gas-fired grid curing and universal ovens listed under New Emission Units and the following five (5) new insignificant combustion units:

**Casting**

- (1) One (1) natural gas-fired boiler, installed in December 2000, exhausting through Stack 236, rated at 0.340 million British thermal units per hour.

**Pasting**

- (2) One (1) natural gas-fired boiler, installed in December 2000, exhausting through Stack 239, rated at 0.340 million British thermal units per hour.

**LCT Assembly**

- (3) One (1) natural gas-fired rapid air heater, installed in December 2000, exhausting through Stack 245, rated at 1.650 million British thermal units per hour.

**Plate Storage Area**

- (4) One (1) natural gas-fired universal oven boiler, installed in December 2000, exhausting through Stack 225, rated at 0.340 million British thermal units per hour.

**Charging**

- (5) One (1) natural gas-fired rapid air heater, installed in December 2000, exhausting through Stack 243, rated at 0.750 million British thermal units per hour.

- (b) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (d) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (e) Cleaning - alcohol, mineral spirits, parts washer; paint; carbon steel welding. VOC less than 3 pounds per hour or 15 pounds per day, PM less than 5 pounds per hour or 25 pounds per day.
- (f) Three (3) electric LCT 1700 battery curing ovens, to be installed, exhausting through Stack 246, capacity: 1,302 pounds of plates and small parts and cell covers per hour, limited by the formation bottleneck to 282,100 pounds (29.7% of capacity) per month and 23.8 liters of cover adhesive per month.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, when applicable shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with



a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),  
or  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Construction Permit Requirement [326 IAC 2]**

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:



Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Overall Source Production Limit [326 IAC 2-8]

(a) The production from the entire source is limited to 51,031,300 pounds of lead in batteries per twelve (12) consecutive month period.

(b) The allowed lead emission rate shall be limited to an amount which in no way will create a violation of the National Ambient Air Quality Standard of 1.5 micrograms of lead per cubic meter averaged over a calendar quarter and measured as elemental lead.

(c) A quarterly summary of the information to document compliance with Condition C.2(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.7 Fugitive Lead Dust Emissions [326 IAC 15-1-3]**

Pursuant to 326 IAC 15-1-3 (Lead emission limitations: control of fugitive lead dust),

- (a) No source shall create or maintain outdoor storage of bulk materials containing more than one percent (1.0%) lead by weight of less than two hundred (200) mesh size particles.
- (b) All materials containing more than one percent (1.0%) lead by weight of less than two hundred (200) mesh size particles shall be transported in closed containers or shall be transported by enclosed conveying systems that are vented to the atmosphere through particulate matter control equipment or shall be transported wet.
- (c) Control programs shall be designed to minimize emissions of lead from all nonprocess fugitive emission points. The programs shall include good housekeeping practices for the cleanup of spills and for minimizing emissions from loading and unloading areas as applicable. Fugitive lead dust shall be controlled according to the plan submitted on December 28, 1999. The plan consists of:
  - (1) All lead oxide bearing material shall be stored inside the plant except for the three (3) outside bulk storage tanks for lead oxide which have dust collectors on top of each tank.
  - (2) The oxide shall be forced into the tanks pneumatically via a semi-trailer bulk tank. Positive oxide will be brought in from outside the plant and put into the tank using an air pump off the semi-tractor. Negative oxide will be brought over to the bulk tank from the oxide mill located on the South West side of the plant via semi-tractor bulk tank. This oxide shall be forced into the bulk tank by an air pump located near the bulk storage tanks.

- (3) Loading of the negative oxide will be performed in the scale house located near the oxide mill. The scale house has one (1) large overhead door on each end of the building allowing entrance and exit. When the semi-trailer is filled it shall be driven around the parking lot on West side of plant to the North end of the plant and backed into the space between the two (2) plant buildings.
- (4) Upon acceptance by C&D's Quality Control personnel of a truck load of lead oxide the following shall be performed:
  - (A) The truck driver shall:
    - (i) Chock the wheels of truck.
    - (ii) Place plastic under the hose coupling in the event small amounts of lead oxide are spilled.
  - (B) The pasting supervisor shall:
    - (i) Insure the bulk storage tank is sufficiently empty, so it can accept the full contents of the truck.
    - (ii) Unlock the lead oxide loading line.
    - (iii) Notify the driver that the unloading may commence.
    - (iv) Fill out "Lead Oxide Unloading Form LOUF-1."
    - (v) Remove himself from the area but within range to watch the start up procedure.
  - (C) The truck driver shall:
    - (i) Perform the hook up procedure.
    - (ii) Insure that a respirator is available in case of a leak.
    - (iii) Begin pumping operation.
    - (iv) Stay with his truck until the unloading procedure is complete.
    - (v) Wear hearing protection if the noise level generated by the pumps motor is equal to or exceeds 90 DBA.
    - (vi) Allow sufficient air to pass through the lines after unloading to insure complete evacuation of the lines.
    - (vii) Unhook his lines. Secure his truck.
  - (D) The pasting supervisor shall:
    - (i) Lock the oxide loading line.
    - (ii) Inspect the area for spills.

- (iii) Release the driver.
  - (iv) Complete and sign the "Lead Oxide Unloading Inspection Form LOUF-1."
  - (v) Present the completed form to the safety coordinator.
- (5) The plant is paved with cement or asphalt in all truck traffic areas with the exception of the back two-thirds (2/3) of the parking lot (chip and seal) and approximately a 100 foot stretch North West of the Plant (gravel and sand). Due to the low potential for lead contamination from oxide bulk semi-trailer handling it is not necessary to clean all paved areas on a scheduled basis. Cleaning shall be on a periodic basis, as required. The oxide loading and unloading areas shall be cleaned on a weekly basis, unless conditions merit more frequent cleaning. The cleaning requirements shall be decided upon by the Plant Environmental Specialist based upon the findings of the daily inspection. If cleanup is required the plant central vacuum system and/or the two (2) Plant Nilfisk vacuums (equipped with HEPA filters) will be utilized. If the material is too large to be vacuumed, sweeping shall be used only to pick up the larger debris.
- (6) The spill clean up procedures are, but not limited to, the following:
  - (A) Immediately stop all traffic in and around the contaminated area.
  - (B) Utilize the metal spill box near the oxide unloading area, which contains the following material pertinent to an oxide spill.
    - (i) Two (2) rolls of plastic (12' x 50'). This will allow for coverage of contaminated area in case of a breeze or while waiting for an appropriate number of personnel to gather.
    - (ii) Ten (10) disposable respirators for personnel while clean up activities are in progress.
    - (iii) One (1) shovel for picking up oxide and any possible contaminated soil.
    - (iv) Ten (10) sand bags for holding down plastic.
    - (v) Five (5) bags Zor-All for holding down plastic or soaking up puddle of oxide contaminated water.
    - (vi) Drain plug for plugging a drain in case of spill during a precipitation event.
  - (C) The source also has at immediate disposal two (2) Nilfisk vacuums which are equipped with HEPA filters and a wet vacuum which can be utilized to clean up any wet oxide, or on any paved areas wash down pavement to a diked area and pick up the lead contaminated water. The captured lead contaminated water shall be treated and filtered through the plant wastewater treatment facility. All plant personnel shall be trained on the Spill Prevention Control and Counter measures on a yearly basis.

- (D) In addition the following procedures shall be followed in the event of any spill:
- (i) Any oxide that is spilled shall be reported to the pasting Supervisor.
  - (ii) Immediately shut down equipment, if pertinent to the spill.
  - (iii) Remember that plastic is being provided to catch oxide and should be used for that purpose. During rain, however the plastic shall not be used.

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.11 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

- (a) Compliance with applicable requirements for the existing emission units (not the new emission units, known as EU 0200B - E, EU 0300A, Bn, C, E, EU 0500E - H, EU 0800K,

EU 0900C and EU 2000F) shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) Compliance with applicable requirements for the new emission units, known as EU 0200B - E, EU 0300A, Bn, C, E, EU 0500E - H, EU 0800K, EU 0900C and EU 2000F, shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure and Flow Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device and the water flow rate, the gauges employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.



**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.19 Monitoring Data Availability**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

### **C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Oxide Mill

- (a) Removed from service.

#### Casting

- (b) One (1) small parts casting operation, known as EU 0100A, installed in 1977, equipped with a Farr 48D cartridge dust collector, to be installed, exhausting through Stack 195, capacity: 1,446 pounds of lead pigs per hour, limited by the formation bottleneck to 214,851 pounds (20.3% of capacity) per month.
- (c) One (1) small parts flaming operation, known as EU 0100B, installed in 1977, last modified October 13, 1977, exhausting through Stack 4, to be exhausted through Stack 195, equipped with a Farr 48D cartridge dust collector, to be installed, capacity: 488 pounds of small parts per hour, limited by the formation bottleneck to 214,851 pounds (60.15% of capacity) per month.
- (d) One (1) grid casting operation, known as EU 0200A, installed in 1977, equipped with a Farr 60LL cartridge dust collector, to be installed, exhausting through Stack 196, capacity: 5,197 pounds of lead pigs per hour, limited by the formation bottleneck to 1,886,883 pounds (49.7% of capacity) per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-5(1)]

#### D.1.1 Lead Emissions [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]

Pursuant to 40 CFR Part 60.372;

- (a) the grid casting facilities (EU 0100A, EU 0100B and EU 0200A) shall not emit any gases that contain in excess of 0.000175 grains of lead per dry standard cubic foot of exhaust, and
- (b) the central vac facility (Maint2000A) shall not emit any gases that contain in excess of 0.000437 grains of lead per dry standard cubic foot of exhaust.

#### D.1.2 Opacity [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]

Pursuant to 40 CFR Part 60.372; the exhaust Stacks (195, 4,196 and 113) shall be limited to zero (0) percent opacity.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the;

- (a) small parts casting operation, known as EU 0100A, and the small parts flaming operation, known as EU 0100B, shall not exceed 4.01 pounds per hour when operating at a total process weight rate of 1,934 pounds per hour.
- (b) grid casting operation, known as EU 0200A, shall not exceed 7.77 pounds per hour when operating at a process weight rate of 5,197 pounds per hour.
- (c) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.4 PM [326 IAC 2-2]

To avoid the requirements of 326 IAC 2-2 the hourly PM emissions from the individual emissions units shall not exceed the following:

Process	Hourly PM Emission Limit (pounds per hour)
Small parts flaming (EU 0100 A and B) Stack 195	0.0073
Grid casting operation (EU 0200A) Stack 196	0.0478
Total	0.0551

#### D.1.5 PM<sub>10</sub> [326 IAC 2-8-4] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-8-4, the hourly PM<sub>10</sub> emissions from the individual emission units shall not exceed the following:

Process	Hourly PM <sub>10</sub> Emission Limit (pounds per hour)
Small parts flaming (EU 0100 A and B) Stack 195	0.0028
Grid casting operation (EU 0200A) Stack 196	0.0182
Total	0.0210

- (b) Compliance with these  $PM_{10}$  emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and 326 IAC 2-2 do not apply.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

**D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

Within twelve (12) months after issuance of this permit, the Permittee shall perform lead and opacity testing of one (1) of the stacks in each group as specified in the following table utilizing methods as approved by the Commissioner to demonstrate compliance with the NSPS Subpart KK requirements of Conditions D.1.1 and D.1.2. These lead and opacity performance tests shall be repeated on a different stack for groups with multiple stacks at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration of the group. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance.

EMISSION UNITS GROUPED BY LIKE PROCESSES AND COLLECTION EQUIPMENT		
Group	Emission Unit	Stack
2	EU 0100A and 0100B	195
3	EU 0200A	196

The Permittee is not required to test these facilities for PM and  $PM_{10}$  by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM and  $PM_{10}$  limits specified in Conditions D.1.3, D.1.4 and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)]**

**D.1.8 Particulate Matter (PM)**

The PM control devices shall be in operation at all times when any of the facilities listed in Section D.1 are in operation.

**D.1.9 Visible Emissions Notations**

- (a) Daily visible emission notations of the Stacks 195 and 196 exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.



- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **D.1.10 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grid casting processes, at least once per day when the grid casting processes is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses associated with EU 0100A and EU 0200A (Stacks 195 and 196) shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.11 Baghouse Inspections**

An inspection shall be performed each calendar quarter of all bags controlling the battery manufacturing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.1.12 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-8-5(3)] [326 IAC 2-8-19]**

#### **D.1.13 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the stack exhausts for Stacks 195 and 196.

- (b) To document compliance with Condition D.1.10, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event.
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain records of the results of the inspections required under Condition D.1.11 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Grid Casting

- (e) Four (4) natural gas-fired grid curing ovens, known as EU 0200B through EU 0200E, to be installed, exhausting through Stacks 226 - 229, respectively, rated at 0.140 million British thermal units per hour each, total process capacity: 3,634 pounds of casted lead grid plates per hour, limited by the formation bottleneck to 1,886,884 pounds (71.1% of capacity) per month.

#### Pasting

- (f) One (1) positive lead oxide bulk handling operation, known as EU 0300A, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting internally through bin vent 232, capacity: 1,526 pounds of positive lead oxide per hour, limited by the formation bottleneck to 689,752 pounds (61.9% of capacity) per month.
- (g) One (1) positive oxide storage, known as EU 0300A, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting internally through bin vent 232, capacity: 2,088 pounds of positive lead oxide per hour, limited by the formation bottleneck to 1,191,581 pounds (78.2% of capacity) per month.
- (h) One (1) negative lead oxide bulk handling operation, known as EU 0300B, installed in 1983, last modified June 10, 1983, equipped with a Flex-Kleen Model 84 dust collector, exhausting internally through bin vent 85, capacity: 1,526 pounds of negative lead oxide per hour, limited by the formation bottleneck to 665,336 pounds (59.7% of capacity) per month.
- (i) One (1) negative oxide storage, known as EU 0300Bn, equipped with a Pneumatics Bin Vent HEPA filter, to be installed, exhausting internally through bin vent 233, capacity: 2,016 pounds of positive lead oxide per hour, limited by the formation bottleneck to 973,728 pounds (66.2% of capacity) per month.
- (j) Removed from Service.
- (k) One (1) paste mixing system, known as EU 0300C, equipped with a Tri Mer wet scrubber, to be installed, exhausting through Stack 231, capacity: 6,268 pounds of negative and positive lead oxide, expander, and dilute sulfuric acid per hour, limited by the formation bottleneck to 2,150,545 pounds (47.0% of capacity) per month.
- (l) One (1) expander manufacturing operation, known as EU 0300D, installed in 1983, equipped with Farr Model 24 LS dust collector, exhausting through Stack 159, capacity: 312 pounds of lead oxide, carbon black, barytes, and barium sulfate per hour.
- (m) One (1) grid pasting system, known as EU 0300E, equipped with a Sly Manufacturing scrubber, to be installed, exhausting through Stack 230, capacity: 11,663 pounds of positive and negative lead paste and lead grids per hour, limited by the formation bottleneck to 4,037,854 pounds (47.4%) per month.
- (n) Four (4) humidity ovens, known as EU 0300 F, G, H and I, exhausting through Stacks 26, 27, 28 and 29, respectively, total process capacity: 2,012 pounds of lead plates per hour, limited by the formation bottleneck to 1,255,488 pounds (85.5% of capacity) per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Facility Description [326 IAC 2-8-4(10)]: Continued**

- (o) Four (4) natural gas-fired Universal curing ovens, known as EU 0300 J, K, L and M, exhausting through Stacks 179, 180, 193 and 194, respectively, rated at 0.800 million British thermal units per hour each, total process capacity: 2,012 pounds of lead plates per hour, limited by the formation bottleneck to 1,255,488 pounds (85.5% of capacity) per month.
- (p) Four (4) natural gas-fired OSI universal ovens, known as EU 0500E through EU 0500H, to be installed, exhausting through Stacks 234, 235, 237 and 238, respectively, rated at 0.800 million British thermal units per hour each, total process capacity: 2,456 pounds of lead plates per hour, limited by the formation bottleneck to 1,532,544 pounds (85.5% of capacity) per month.

**Three Process Operation**

- (q) Removed From Service.
- (r) One (1) 3PO-plate processing operation, known as EU 0700B, installed in 1993, last modified October 26, 1993, equipped with an OSI dust collector, exhausting through Stack 152, capacity: 2,914 pounds of plate frames per hour, limited by the formation bottleneck to 1,010,672 pounds (47.5% of capacity) per month.
- (s) One (1) 3PO-plate processing operation, known as EU 0700C, installed in 1993, last modified October 26, 1993, equipped with an OSI dust collector, exhausting through Stack 151, capacity: 2,914 pounds of plate frames per hour, limited by the formation bottleneck to 1,010,672 pounds (47.5% of capacity) per month.
- (t) Removed From Service.
- (u) One (1) 3PO-plate processing operation, known as EU 0700E, installed in 1995, equipped with a Torit dust collector, exhausting through Stack 127, capacity: 160 pounds of plate frames per hour, limited by the formation bottleneck to 55,573 pounds (47.5% of capacity) per month.
- (v) One (1) 3PO-plate processing operation, known as EU 0700F, equipped with a Farr dust collector, exhausting through Stack 247, capacity: 8,473 pounds of plate frames per hour, limited by the formation bottleneck to 3,809,664 pounds per month (46.5% of capacity).

**Three Process Operation**

- (w) One (1) 3PO-L plate assembly operation, known as EU 0800A, installed March 30, 1984, equipped with an American air filter dust collector, exhausting through Stack 140, capacity: 1,444 pounds of cured plates and small parts per hour, limited by the formation bottleneck to 548,720 pounds (52.1% of capacity) per month.
- (x) One (1) 3PO-L plate assembly operation, known as EU 0800B, installed in 1988, last modified April 8, 1988, equipped with an American air filter dust collector, exhausting through Stack 166, capacity: 2,165 pounds of positive and negative plates and small parts per hour, limited by the formation bottleneck to 822,700 pounds (52.1% of capacity) per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Facility Description [326 IAC 2-8-4(10)]: Continued**

- (y) One (1) 3PO-L plate assembly operation, known as EU 0800C, installed in 1984, last modified March 30, 1984, equipped with an OSI #10 dust collector, exhausting through Stack 142, capacity: 2,165 pounds of cured plates and small parts per hour, limited by the formation bottleneck to 822,700 pounds (52.1% of capacity) per month.
- (z) One (1) 3PO-MP assembly, known as EU 0800D, installed in 1993, last modified January 1, 1993, equipped with a Torit dust collector, exhausting through Stack 127, capacity: 2,404 pounds of cured plates and small parts and cell covers per hour, limited by the formation bottleneck to 67,112 pounds (3.8% of capacity) per month and 5.662 liters of cover adhesive per month.
- (aa) One (1) 3PO-JC/D assembly, known as EU 0800E, installed in 1994, last modified December 5, 1994, equipped with a Torit dust collector, exhausting through Stack 247, capacity: 174 pounds of cured plates and small parts and cell covers per hour limited by the formation bottleneck to 56,550 pounds per month (44.5% of capacity) and 4.943 liters of cover adhesive per month.
- (bb) One (1) 3PO-MCT assembly, known as EU 0800F, installed in 1999, equipped with a Farr 48D dust collector, exhausting through Stack 188, capacity: 3,813 pounds of lead plates and small parts and cell covers per hour, limited by the formation bottleneck to 1,652,300 pounds (59.4% of capacity) per month and 139.875 liters of cover adhesive per month.
- (cc) One (1) L-cell cover adhesive station, known as EU 0800G, installed in 1982, exhausting through Stack 167, capacity: 4,000 pounds of L-cells per hour, limited by the formation bottleneck to 2,195,000 pounds of L-cells and covers per month (75.2% of capacity) and 185.5 liters of cover adhesive per month.
- (dd) One (1) 3PO-L cell cover insert, known as EU 0800H, installed in 1984, last modified March 30, 1984, equipped with two (2) Torit dust collectors, exhausting through Stack 141, capacity: 600 pounds of assembled cells per hour, limited by the formation bottleneck to 153,600 pounds (35.1% of capacity) per month.

**Three Process Operation**

- (ee) One (1) LCT 1700 Assembly with two jigs, known as EU 0800K, installed in December 2000, equipped with a Farr dust collector, exhausting through Stack 244, capacity: 1,302 pounds of plates and small parts and cell covers per hour, limited by the formation bottleneck to 282,100 pounds (29.7% of capacity) per month and 23.8 liters of cover adhesive per month.

**Formation**

- (ff) One (1) tank dry formation, known as EU 0900A, installed in 1990, last modified March 5, 1990, equipped with a scrubber, exhausting through Stack 178, capacity: 200 pounds of lead plates per hour.
- (gg) One (1) tank wet formation, known as EU 0900B, installed in 1990, capacity: 3,420 pounds of dry batteries per hour (fugitive).
- (hh) One (1) tank wet formation, known as 0900C, to be installed, capacity: 2,215 pounds of completed dry cells per hour (fugitive).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Facility Description [326 IAC 2-8-4(10)]: Continued**

**Central Vac**

- (ii) One (1) central vacuum #2, known as Maint2000B, installed October 6, 1980, exhausting through Stack 129.
- (jj) One (1) 3 process central vacuum, known as Maint2000C, installed in 1980, exhausting through Stack 130.
- (kk) One (1) 3 process central vacuum , known as Maint2000D, installed in 1980, exhausting through Stack 131.
- (ll) One (1) grid casting central vacuum #5, known as Maint2000E, installed November 19, 1999, exhausting through Stack 224.
- (mm) One (1) pasting central vacuum, known as EU 2000F, to be installed, exhausting through Stack 242.
- (nn) One (1) polyurethane battery topping, known as Misc, installed in 1990, exhausting through Stack 160, capacity: 30 gallons of perchloroethylene per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-8-5(1)]**

**D.2.1 Lead Emissions [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]**

Pursuant to 40 CFR Part 60.372, the grid casting curing ovens (EU 0200B - E and Maint2000E), the pasting operations (EU 0300A, B, Bn, C - M, 0500E - H and Maint2000F), the three process operations (EU 0700B, C, E, F, 0800A - H, K, and Maint2000C & D) and the Central Vac operations (Maint2000B) shall not emit any gases that contain in excess of 0.000437 grains of lead per dry standard cubic foot of exhaust.

**D.2.2 Opacity [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK.)]**

Pursuant to 40 CFR Part 60.372, the grid casting curing oven exhaust stacks (226 - 229 and 224), the pasting operations exhaust Stacks (232, 85, 233, 230, 231, 159, 26- 29, 179, 180, 193, 194, 234, 235, 237, 238 and 242), the three process operations exhaust Stacks (152, 151, 127, 247, 140, 166, 142, 188, 167, 141, 244, 130 and 131) and the Central Vac operations exhaust Stack (129) shall be limited to zero (0) percent opacity.

### D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the facilities listed in this section shall not exceed the stated PM emission rates listed in the following table:

<b>Operation</b>	<b>Process Weight Rate (tons per hour)</b>	<b>Allowable PM Emission Rate (pounds per hour)</b>
Natural gas-fired grid curing ovens (EU 0200B through EU 0200E) Stacks 226 - 229	3,634 total	6.12 total
Positive lead oxide bulk handling (EU 0300A) Stack 84	1,526	3.42
Positive oxide storage (EU 0300A) Bin Vent 232	2,088	4.22
Negative lead oxide bulk handling (EU 0300B) Bin Vent 85 (0300B)	1,526	3.42
Negative oxide storage (EU 0300Bn) Bin Vent 233	2,016	4.12
Paste mixing system (EU 0300C) Stack 231	6,268	8.81
Expander manufacturing (EU 0300D) Stack 159	312	1.18
Grid pasting (EU 0300 E) Stack 230	11,663	13.4
Humidity ovens (EU 0300 F, G, H, and I) Stacks 26 - 29	2,012 total	4.12
Natural gas-fired Universal curing ovens (EU 0300 J, K, L and M) Stacks 179, 180, 193 and 194	2,012 total	4.12
Natural gas-fired OSI Universal ovens (EU 0500E through EU 0500H) Stacks 234, 235, 237 and 238	2,456 total	4.71
3PO-plate processing (0700B) Stack 152	2,914	5.28
3PO-plate processing (0700C) Stack 151	2,914	5.28
3PO-plate processing (0700E) Stack 127	160	0.755
3PO-plate processing (0700F) Stack 247	8,473	10.8
3PO-L plate assembly (0800A) Stack 140	1,444	3.30

<b>Operation</b>	<b>Process Weight Rate (tons per hour)</b>	<b>Allowable PM Emission Rate (pounds per hour)</b>
3PO-L plate assembly (0800B) Stack 166	2,165	4.32
3PO-L plate assembly (0800C) Stack 142	2,165	4.32
3PO-MP assembly (0800D) Stack 127	2,404	4.64
3PO-JC/D assembly (0800E) Stack 247	174	0.798
3PO-MCT assembly (0800F) Stack 188	3,813	6.32
3PO-L cell cover insert (0800H) Stack 141	600	1.83
LCT 1700 assembly with two jigs (EU 0800K) Stack 244	1,302	3.08
Tank dry formation (0900A) Stack 178	200	0.877
Tank wet formation (0900B) Fugitive	3,420	5.87
Tank wet formation (0900C) Fugitive	2,215	4.39

- (b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.4 PM [326 IAC 2-2]

To avoid the requirements of 326 IAC 2-2, the hourly PM emissions from the individual emissions units shall not exceed the following:



<b>Operation/Stack ID</b>	<b>Hourly PM Emission Limits (pounds per hour)</b>
Natural gas-fired grid curing ovens (EU 0200B through EU 0200E) Stacks 226 - 229	0.0869 0.0869 0.0869 0.0869
Positive oxide storage (EU 0300A) Bin Vent 232	0.1000
Negative lead oxide bulk handling (EU 0300B) Bin Vent 85 (0300B)	0.0090
Negative oxide storage (EU 0300Bn) Bin Vent 233	0.1201
Paste mixing system (EU 0300C) Stack 231	0.3474
Expander manufacturing (EU 0300D) Stack 159	0.0014
Grid pasting (EU 0300 E) Stack 230	0.3444
Humidity ovens (EU 0300 F, G, H, and I) Stacks 26 - 29	0.0310 0.0310 0.0310 0.0310
Natural gas-fired Universal curing ovens (EU 0300 J, K, L and M) Stacks 179, 180, 193 and 194	0.0310 0.0310 0.0310 0.0310
Natural gas-fired OSI Universal ovens (EU 0500E through EU 0500H) Stacks 234, 235, 237 and 238	0.0378 0.0378 0.0378 0.0378
3PO-plate processing (0700B) Stack 152	0.0565
3PO-plate processing (0700C) Stack 151	0.0565
3PO-plate processing (0700E) Stack 127	0.0092
3PO-plate processing (0700F) Stack 247	0.3303
3PO-L plate assembly (0800A) Stack 140	0.2662
3PO-L plate assembly (0800B) Stack 166	0.3993
3PO-L plate assembly (0800C) Stack 142	0.0399

<b>Operation/Stack ID</b>	<b>Hourly PM Emission Limits (pounds per hour)</b>
3PO-MP assembly (0800D) Stack 127	0.4433
3PO-JC/D assembly (0800E) Stack 247	0.0321
3PO-MCT assembly (0800F) Stack 188	0.7032
3PO-L cell cover insert (0800H) Stack 141	1.19
LCT 1700 assembly with two jigs (EU 0800K) Stack 244	0.072
Tank dry formation (0900A) Stack 178	0.880
Tank wet formation (0900B) Fugitive	30.1
Tank wet formation (0900C) Fugitive	19.5
Total	55.73

**D.2.5 PM<sub>10</sub> [326 IAC 2-8-4] [326 IAC 2-2]**

- (a) Pursuant to 326 IAC 2-8-4, the hourly PM<sub>10</sub> emissions from the individual emission units shall not exceed the following:

<b>Operation/Stack ID</b>	<b>Hourly PM<sub>10</sub> Emission Limits (pounds per hour)</b>
Natural gas-fired grid curing ovens (EU 0200B through EU 0200E) Stacks 226 - 229	0.0331 0.0331 0.0331 0.0331
Positive oxide storage (EU 0300A) Bin Vent 232	0.0380
Negative lead oxide bulk handling (EU 0300B) Bin Vent 85 (0300B)	0.0034
Negative oxide storage (EU 0300Bn) Bin Vent 233	0.0457
Paste mixing system (EU 0300C) Stack 231	0.1322
Expander manufacturing (EU 0300D) Stack 159	0.0005

<b>Operation/Stack ID</b>	<b>Hourly PM<sub>10</sub> Emission Limits (pounds per hour)</b>
Grid pasting (EU 0300 E) Stack 230	0.1311
Humidity ovens (EU 0300 F, G, H, and I) Stacks 26 - 29	0.0118 0.0118 0.0118 0.0118
Natural gas-fired Universal curing ovens (EU 0300 J, K, L and M) Stacks 179, 180, 193 and 194	0.0118 0.0118 0.0118 0.0118
Natural gas-fired OSI Universal ovens (EU 0500E through EU 0500H) Stacks 234, 235, 237 and 238	0.0144 0.0144 0.0144 0.0144
3PO-plate processing (0700B) Stack 152	0.0215
3PO-plate processing (0700C) Stack 151	0.0215
3PO-plate processing (0700E) Stack 127	0.0035
3PO-plate processing (0700F) Stack 247	0.1257
3PO-L plate assembly (0800A) Stack 140	0.1013
3PO-L plate assembly (0800B) Stack 166	0.1520
3PO-L plate assembly (0800C) Stack 142	0.0152
3PO-MP assembly (0800D) Stack 127	0.1687
3PO-JC/D assembly (0800E) Stack 247	0.0122
3PO-MCT assembly (0800F) Stack 188	0.2677
3PO-L cell cover insert (0800H) Stack 141	0.4528
LCT 1700 assembly with two jigs (EU 0800K) Stack 244	0.0274
Tank dry formation (0900A) Stack 178	0.3350

<b>Operation/Stack ID</b>	<b>Hourly PM<sub>10</sub> Emission Limits (pounds per hour)</b>
Tank wet formation (0900B) Fugitive	11.4555
Tank wet formation (0900C) Fugitive	7.4198
<b>Total</b>	<b>21.215</b>

- (b) Compliance with these PM<sub>10</sub> emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and 326 IAC 2-2 do not apply.

**D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

**D.2.7 Testing Requirements [326 IAC 2-8-5(a)(1)&(4)] [326 IAC 2-1.1-11]**

- (a) Within 180 days of startup of EU 0700F, the Permittee shall perform lead and opacity testing of Stack 247 utilizing methods as approved by the Commissioner to demonstrate compliance with the NSPS Subpart KK requirements of Conditions D.2.1 and D.2.2.
- (b) Within twelve (12) months after issuance of this permit, the Permittee shall perform lead and opacity testing of one (1) of the stacks in each group as specified in the following table utilizing methods as approved by the Commissioner to demonstrate compliance with the NSPS Subpart KK requirements of Conditions D.2.1 and D.2.2. USEPA has approved an alternative stack testing parameter for only the Group 5 (EU 0300A, EU 0300B, and EU 0300Bn) lead oxide storage silos. The stack sampling time for the Group 5 test is decreased to fifteen (15) minutes. The Permittee shall perform two (2) tests and the results of these two (2) tests shall be averaged. These lead and opacity performance tests shall be repeated on a different stack for groups with multiple stacks at least once every two and one-half (2.5) years from the date of the last valid compliance demonstration of the group. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance.

<b>EMISSION UNITS GROUPED BY LIKE PROCESSES AND COLLECTION EQUIPMENT</b>		
<b>Group</b>	<b>Emission Unit</b>	<b>Stack</b>
4	EU 0200B	226
	EU 0200C	227
	EU 0200D	228
	EU 0200E	229
5	EU 0300A	Bin Vent 232
	EU 0300B	Bin Vent 85
	EU 0300Bn	Bin Vent 233
6	EU 0300C	231
7	EU 0300D	159

Group	Emission Unit	Stack
8	EU 0300E	230
9	EU 0300F	26
	EU 0300G	27
	EU 0300H	28
	EU 0300I	29
10	EU 0300J	179
	EU 0300K	180
	EU 0300L	193
	EU 0300M	194
	EU 0500E	234
	EU 0500F	235
	EU 0500G	237
	EU 0500H	238
11	EU 0700F	247
	EU 0800E	247
12	EU 0700B	152
	EU 0700C	151
13	EU 0800D	127
	EU 0700E	127
14	EU 2000A	113
	EU 2000F	242
	MAINT 2000C	130
	MAINT 2000D	131
	MAINT 2000B	129
15	EU 0800A	140
	EU 0800B	166
16	EU 0800C	142
17	EU 0800F	188
18	EU 0800G	167
	EU 0800K	244
19	EU 0800H	141

- (c) The Permittee is not required to test these facilities for PM and PM<sub>10</sub> by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM and PM<sub>10</sub> limits specified in Conditions D.2.3, D.2.4 and D.2.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## **Compliance Monitoring Requirements [326 IAC 2-8-6(1)] [326 IAC 2-8-5(1)]**

### **D.2.8 Particulate Matter (PM)**

The PM control devices shall be in operation at all times when any of the facilities listed in Section D.2 are in operation.

### **D.2.9 Visible Emissions Notations**

- (a) Daily visible emission notations of Stack 226 - 229, 232, 85, 233, 231, 159, 230, 26 - 29, 179, 180, 193, 194, 234, 235, 237, 238, 127, 152, 151, 247, 140, 166, 142, 188, 141, 244 and 178 exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **D.2.10 Parametric Monitoring**

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the pasting, three process, and Central Vac operations, at least once per day when the pasting, three process and Central Vac processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses associated these operations shall be maintained within the ranges specified in the following table or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

<b>Emission Unit</b>	<b>S/V ID</b>	<b>Pressure Drop (inches of water)</b>
(EU 0300A)	84	3 - 8
(EU 0300A)	232	1 - 7
(EU 0300B)	85	3 - 8
(EU 0300Bn)	233	1 - 7
(EU 0300D)	159	2 - 7
(EU 0700B)	152	2 - 7
(EU 0700C)	151	2 - 7
(EU 0700E/0800D)	127	2 - 8
(EU 0700F/0800E)	247	1 - 7
(EU 0800A)	140	1 - 6
(EU 0800B)	166	1 - 6
(EU 0800C)	142	5 - 11
(EU 0800F)	188	1 - 6
(EU 0800H)	141	2 - 6 and 2 - 6
(EU 0800K)	244	6 - 12
(MAINT2000A)	113	6 - 12
(MAINT2000B)	129	6 - 12
(MAINT2000C)	130	6 - 12
(MAINT2000D)	131	6 - 12
(MAINT2000E)	224	6 - 12
(MAINT2000F)	242	6 - 12

- (b) The Permittee shall record the water flow rate of the scrubbers at least once per day when the pasting and formation processes are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the water flow rate shall be maintained within the ranges of water as specified in the following table or water flow rate ranges established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the water flow rate are outside of the above mentioned range for any one reading.

<b>Emission Unit</b>	<b>S/V ID</b>	<b>Pressure Drop (inches of water)</b>	<b>Flow Rate (gallons per minute)</b>
(EU 0300C)	231	4 - 10	Not Applicable
(EU 0300E)	230	3 - 8	30
(EU 0900A)	178	3 - 8	1.5

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.2.11 Filter Monitoring

Daily inspections shall be performed to verify the placement, integrity and particle loading of the HEPA filters associated with EU 0300A and 0300Bn, exhausting internally to bin vent 232 and 233. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### D.2.12 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the battery manufacturing operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### D.2.13 Scrubber Inspection

An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection.

#### D.2.14 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).



#### D.2.15 Scrubber Failure Detection

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In the event that a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-8-5(3)] [326 IAC 2-8-19]**

#### D.2.16 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.9, the Permittee shall maintain records of daily visible emission notations of Stacks 226 - 229, 232, 85, 233, 231, 159, 230, 26 - 29, 179, 180, 193, 194, 234, 235, 237, 238, 127, 152, 151, 247, 140, 166, 142, 188, 141, 244 and 178 exhausts.
- (b) To document compliance with Condition D.2.10, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure;
    - (B) Cleaning cycle: frequency and differential pressure, and
    - (C) Water flow rate for the scrubbers.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Conditions D.2.11, D.2.12, and D.2.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.11, D.2.12 and D.2.13 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour consisting of fifty-six (56) existing facilities rated at total of 56.10 million British thermal units per hour, including two (2) pasting boilers, exhausting through Stacks 163 and 164, rated at 0.690 and 1.050 million British thermal units per hour, respectively.

#### Casting

- (1) One (1) natural gas-fired boiler, installed in December 2000, exhausting through Stack 236, rated at 0.340 million British thermal units per hour.

#### Pasting

- (2) One (1) natural gas-fired boiler, installed in December 2000, exhausting through Stack 239, rated at 0.340 million British thermal units per hour.

#### LCT Assembly

- (3) One (1) natural gas-fired rapid air heater, installed in December 2000, exhausting through Stack 245, rated at 1.650 million British thermal units per hour.

#### Plate Storage Area

- (4) One (1) natural gas-fired universal oven boiler, installed in December 2000, exhausting through Stack 225, rated at 0.340 million British thermal units per hour.

#### Charging

- (5) One (1) natural gas-fired rapid air heater, installed in December 2000, exhausting through Stack 243, rated at 0.750 million British thermal units per hour.

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

- (c) Three (3) electric LCT 1700 battery curing ovens, to be installed, exhausting through Stack 246, capacity: 1,302 pounds of plates and small parts and cell covers per hour, limited by the formation bottleneck to 282,100 pounds (29.7% of capacity) per month and 23.8 liters of cover adhesive per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-5(1)]

#### D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation after September 21, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

#### D.3.2 Volatile Organic Compounds (VOC)

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Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.3.3 Volatile Organic Compounds (VOC)

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(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.4 Lead Emissions [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]

Pursuant to 40 CFR Part 60.372, the three (3) LCT 1700 electric battery curing ovens shall not emit any gases that contain in excess of 0.000437 grains of lead per dry standard cubic foot of exhaust.

D.3.5 Opacity [326 IAC 12, (40 CFR Part 60.370 - 60.374, Subpart KK)]

Pursuant to 40 CFR Part 60.372, the three (3) LCT 1700 electric battery curing ovens exhaust Stack 246 shall be limited to zero (0) percent opacity.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: C & D Technologies, Inc.  
Source Address: 200 West Main Street, Attica, Indiana 47918  
Mailing Address: 200 West Main Street, Attica, Indiana 47918  
FESOP No.: F 045-11285-00008

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Branch**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: C & D Technologies, Inc.  
Source Address: 200 West Main Street, Attica, Indiana 47918  
Mailing Address: 200 West Main Street, Attica, Indiana 47918  
FESOP No.: F 045-11285-00008

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)  
The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**FESOP Quarterly Report**

Source Name: C & D Technologies, Inc.  
Source Address: 200 West Main Street, Attica, Indiana 47918  
Mailing Address: 200 West Main Street, Attica, Indiana 47918  
FESOP No.: F 045-11285-00008  
Facility: Entire Source  
Parameter: Total Weight of Lead in Batteries  
Limit: 51,031,300 pounds of lead in batteries per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Lead in Batteries (pounds)	Lead in Batteries (pounds)	Lead in Batteries (pounds)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: C & D Technologies, Inc.  
Source Address: 200 West Main Street, Attica, Indiana 47918  
Mailing Address: 200 West Main Street, Attica, Indiana 47918  
FESOP No.: F 045-11285-00008

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.